

EXHIBIT A

MONTGOMERY, McCracken, Walker & Rhoads, LLP
ATTORNEYS AT LAW

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ADMITTED IN PENNSYLVANIA & NEW JERSEY

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October 10, 2003

VIA CERTIFIED MAIL

Jason Roman
911 Varnsdale Road
Allentown, PA 18103

Re: *Roman v. City of Reading and Reading Police Department*
USC EDPA No. 02-CV-4763

Dear Mr. Roman:

I hereby serve you with the following:

- (1) Disclosures By Defendants City of Reading And Reading Police Department Pursuant to Fed. R. Civ. P. 26(A)(1);
- (2) Defendants' First Set of Interrogatories Directed to Plaintiff Jason Roman;
- (3) Defendants' First Set of Requests For Production of Documents Directed to Plaintiff Jason Roman; and
- (4) Notice of Deposition for Plaintiff Jason Roman.

Please note that the Federal Rules of Civil Procedure require all parties to make initial disclosures that provide: (1) the name and address of each individual likely to have information regarding that parties claims or defenses; (2) a copy of or a description of all documents that the party may use to support his claims or defenses; (3) a computation of damages; and (4) a copy or description of any insurance agreement. Kindly provide plaintiff's disclosures in conjunction with the discovery responses.

Please also note that the Federal Rules of Civil Procedure require that responses to Interrogatories and Requests for Production of Documents be served within 30 days of receipt.

MONTGOMERY, McCracken, Walker & Rhoads, LLP

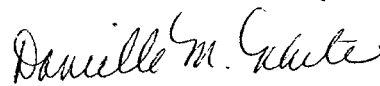
Jason Roman

October 10, 2003

Page 2

If you have any questions about the enclosed documents, the request for plaintiff's initial disclosures, or about the deposition scheduled for November 3, 2003 at 10 a.m., please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Danielle M. White".

Danielle M. White

DMW
Enclosures

EXHIBIT B

MONTGOMERY, McCracken, Walker & Rhoads, LLP
ATTORNEYS AT LAW

JANELLE E. FULTON
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November 17, 2003

BY FACSIMILE AND REGULAR MAIL

W. Thomas Anthony, Esquire
451 Main Street
Bethlehem, PA 18018

Re: Roman v. City of Reading and Reading Police Department
USDC EDPA No. 02-CV-4763

Dear Mr. Anthony:

This will confirm that, on Friday, November 14, you advised my secretary that you were unable to attend your client's deposition on Monday, November 17, but that you are available on December 3 at 11:00 a.m. Accordingly, enclosed is a Third Amended Notice of Deposition rescheduling Mr. Roman's deposition for Wednesday, December 3 at 11:00 a.m. in our office.

In addition, your client's initial disclosures and his answers to Defendants' written discovery are now overdue. Please provide these within ten (10) days so we are not forced to burden the Court with a discovery motion.

Sincerely,



Janelle E. Fulton

JEF:bms

Enclosure

cc: David J. MacMain, Esquire (w/o enclosure)

EXHIBIT C

MONTGOMERY, McCRACKEN, WALKER & RHOADS, LLP
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December 30, 2003

BY FACSIMILE AND REGULAR MAIL

W. Thomas Anthony, Esquire
451 Main Street
Bethlehem, PA 18018

Re: *Roman v. City of Reading and Reading Police Department*
USDC EDPA No. 02-CV-4763

Dear Mr. Anthony:

On October 10, 2003, we served interrogatories and requests for production of documents on your client. On December 3, I provided you with an additional copy of the interrogatories and document requests. Your client's answers to Defendants' written discovery are nearly two months overdue. Furthermore, I have still not received your client's initial disclosures. Finally, on by letter dated December 9, 2003, my paralegal advised you that two of the providers your client identified at his deposition require that their own releases be executed before they will release Mr. Roman's records and she forwarded those release to you for your client's signature.

If I do not receive these materials within ten (10) days, I will have no choice but to file a motion with the Court.

Sincerely,



Janelle E. Fulton

JEF:bms

cc: David J. MacMain, Esquire
Eileen Binderman

EXHIBIT D

MONTGOMERY, McCRACKEN, WALKER & RHODES, LLP
ATTORNEYS AT LAW

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November 11, 2003

BY FACSIMILE ONLY

W. Thomas Anthony, Esquire
451 Main Street
Bethlehem, PA 18018

Re: *Roman v. City of Reading and Reading Police Department*
USDC EDPA No. 02-CV-4763

Dear Mr. Anthony:

Per our telephone conversation, attached is a copy of the Second Amended Notice of Deposition rescheduling your client's deposition for Monday, November 17, 2003, beginning at 10:00 a.m. at our office. I served the original of this Notice on your client by letter dated November 4, 2003.

In addition, please note that we served the following on your client on October 10, 2003:

- (1) Disclosures by Defendants City of Reading and Reading Police Department Pursuant to Fed. R. Civ. P. 26(A)(1);
- (2) Defendants' First Set of Interrogatories Directed to Plaintiff Jason Roman; and
- (3) Defendants' First Set of Requests for Production of Documents Directed to Plaintiff Jason Roman.

MONTGOMERY, McCracken, Walker & Rhoads, LLP

W. Thomas Anthony, Esquire
November 11, 2003
Page 2

The answers to the written discovery are now due. If Mr. Roman has not provided you with these materials, or if he is unable to do so, and you would like me to send you a copy, let me know.

Finally, please send me a copy of your entry of appearance on behalf of Mr. Roman at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Janelle E. Fulton", with a long horizontal flourish extending to the right.

Janelle E. Fulton

JEF:bms
Enclosure

cc: David J. MacMain, Esquire (w/o enclosure)

EXHIBIT E

W. THOMAS ANTHONY, JR.
ATTORNEY AT LAW
451 MAIN STREET
BETHLEHEM, PENNSYLVANIA 18018
(610) 691-7633
FAX: (610) 866-4626

received
11/7/03

November 4, 2003

David J. MacMain, Esquire
Danielle M. White, Esquire
Montgomery, McCracken, Walker & Rhoads, LLP
123 South Broad Street
Philadelphia, PA 19109

Re: Jason Roman vs. City of Reading, et al.

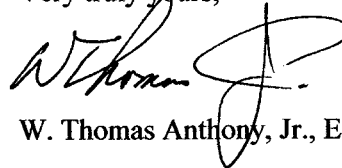
Dear Mr. MacMain and Ms. White:

Please be advised that I have been contacted by Jason Roman to represent him in his action against the City of Reading, which is now pending in the U. S. District Court for the Eastern District of Pennsylvania.

Late yesterday afternoon in connection with this case, Mr. Roman showed me the notice of deposition which you had sent to him. We both discovered that the deposition was scheduled for yesterday morning. He had told me previously that the deposition was scheduled for a later date. We apologize sincerely for this error, and we would like to reschedule the deposition at your convenience.

Since I am out of my office quite often, it is sometimes easier to reach me by my pager. That number is (610) 798-8661. Just enter your phone number after you hear the beeps; there is no voice message. I will await to hear from you in this regard.

Very truly yours,



W. Thomas Anthony, Jr., Esquire

cc: Jason Roman

EXHIBIT F

MONTGOMERY, McCracken, Walker & Rhoads, LLP
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LEGAL ASSISTANT

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December 9, 2003

VIA FIRST CLASS MAIL

W. Thomas Anthony, Esquire
451 Main Street
Bethlehem, PA 18018

Re: *Jason Roman v. City of Reading and Reading Police Department*
U.S.D.C. for the E.D. of Pa., No. 02-CV-4763


Dear Mr. Anthony:

Thank you for having your client sign the HIPAA-Compliant Authorizations to release medical and psychological records at his deposition last week.

I have contacted 5 of Mr. Roman's medical providers, and while several have said they will accept this firm's HIPAA Compliant Authorization, 2 of the providers have their own releases that must be executed before they will release Mr. Roman's records. I have enclosed these releases, and ask that you have your client sign and date them where indicated (Lehigh County also requires signature of a witness) and return them to this office as soon as possible.

Thank you in advance for your assistance in this matter.

Very truly yours,


Eileen Binderman

/eb

Enclosures

cc: ☒ Janelle E. Fulton, Esquire (w/enclosures)